

BRUCELLOSIS - TRANSMISSION AND PUBLIC PERCEPTION

6,465 comments. The public perception of brucellosis is that the risk of transmission of the disease cannot be quantified (or at least the DEIS does not quantify the risk) and that the risk of transmission is speculative - that no confirmed cases of transmission in the wild of brucellosis to cattle have been documented from bison. Several comments say that more research is needed and that until that research is completed, agency actions taken now will be flawed - that they will be political, not logical. Some comments state that all alternatives will continue the killing of bison without real proof of the transmission of the disease. Others state that slaughter cannot be justified, and that the public is aware of the low level or absence of risk from brucellosis transmission. Related comments can be found in [Brucellosis - Risk Management](#).

Comment 1

“...I am also very much in favor of research to determine if there is any reality to the concerns of ranchers that brucellosis can be transmitted from bison to cattle in the wild. Research must provide answers to the spread of brucellosis in both cattle and bison. We need facts! Facts must determine policy.” - Individual, W. Islip, NY, YELL-122.

Comment 2

“The risk of transferring disease seem[s] very low. The fact that brucellosis is transferred mainly through birthing processes makes one wonder why ranchers are so paranoid. How many bison give birth while starving in the winter?” - Individual, Athens, GA, YELL-131.

Comment 3

“We in Canada, have found that the risk is extremely remote and have stopped targeting bison for removal. If any risk exists, it can be nearly eliminated through the sensible and feasible risk management strategies, including, prohibiting the use of snowmobiles in the park, prohibiting cattle grazing on cattle lands outside the park, and requiring the vaccination of cattle on private land.” - Organization, Manitoba Animal Alliance, YELL-150.

Comment 4

“The following evidence suggests to us that risk of Brucellosis transmission is slight: (a) Behavioral patterns bring bison only rarely into contact with cattle; (b) The disease organism is readily killed by heat, sun, and dryness outside the host, making transmission highly unlikely unless cattle are present at the time of a bison birth event; Few bison display pathology (abortions), suggesting the presence of many resistant or partially resistant individuals; (d) Transmission by bull is improbable; (e) Culture tests (unlike the less accurate serology tests) suggest that disease prevalence in the bison population ranges between merely, 10 to 15%; (f)

Vaccinations are approximately 70% effective in preventing the disease in cattle. - Tribe, Flandreau Santee Sioux Tribe, YELL-194.

Comment 5

“The impact statement recognizes that the threat of brucellosis to domestic cattle is a theoretical threat at best. Transmission of brucellosis to domestic cattle has never taken place. If it had, you would have been informed by the same farmers that are currently up in arms. Yet each option treats this theoretical threat as if it has to be taken seriously if only to placate the irrational fears of farmers, who obviously do not have the interests of the National Park or the resident bison at heart.” - Individual, Vienna, VA, YELL-316.

Comment 6

“I find the emphasis on vaccinating bison...to be misdirected, especially given the lack of proof that a danger exists. Vaccinate the cattle.” Individual, Aledo, TX, YELL-13298.

BRUCELLOSIS - RISK MANAGEMENT

635 comments; only a small number (< 10) were opposed to conducting risk management analysis in the EIS. Many comments urged Montana to change its zero tolerance policy and to accept scientifically acceptable levels of risk. Some indicated that Montana’s current risk policy is not scientifically based, but political. Some comments from Montana felt the DEIS was discrediting the level of available brucellosis research. Others felt the cost for total eradication of brucellosis would be far too great for taxpayers, and that current control techniques for brucellosis could be made to work (cattle vaccination, separation of bison and cattle in time and space, and controlling herd size by various techniques). Comments indicated that the risk of brucellosis transmission was so remote that risk management would be the only cost-effective approach. Other comments criticized the DEIS for not using any valid form of actual risk assessment. Finally, supporters of the Plan B and Bison alternatives state those alternatives should be supported because they utilize risk management. Related comments can be found in [Brucellosis - Transmission and Public Perception](#).

Comment 1

“Because the risk of bacteria transmission between bison and cattle is extremely remote, risk management is far more sensible, economical, and ecologically sound alternative to bacteria elimination. A risk management program should include: an end to the shooting or hunting of bison...Mandatory vaccination of domestic calves (within the counties surrounding Yellowstone National Park) against brucellosis. Further research into the development of an effective vaccine against brucellosis for bison.” - Individual, Jonesboro, GA, YELL-10252.

Comment 2

“The NPS is basing a bison management plan, which involves harsh population control, on purely speculative information relating to infection of livestock by bison.”- Individual, Lake Oswego, OR, YELL-10377.

Comment 3

The Plan B alternative states “...Urge Montana to accept the federal government’s definition of ‘low risk’ bison, and allow their free movement like elk and other wildlife. All states except Montana has accepted this definition. Urge all states to respect the brucellosis classification assigned to states by the federal government. The federal government has classified Montana as ‘Brucellosis-free’. A small number of states, some of which compete with Montana for cattle markets, have, without providing scientific justification, imposed sanctions restricting import of Montana cattle. This is the key factor which has made the disease problematic for Montana...” - Individual, YELL-10475a.

Comment 4

“Again, since other cattle states (like Utah, Oklahoma and Texas) vaccinate their cattle and since that vaccine is available now, why can’t Montana cattlemen do the same? No one vaccinates wild animals on public or private lands. Why, indeed, would you even consider this in Yellowstone National Park.” - Individual, Santee, CA, YELL-10613.

Comment 5

“The Alternative Interpretation of Risk section in the DEIS should never have been permitted. It is a blatant attempt to discredit the current knowledge we have about brucellosis and bison resulting from the limited research that has occurred. This section is filled with conjecture that is not backed up by research. It is a splendid example of how YNP and the environmental community stonewall if they do not want to address a certain issue.” - Organization - Hagenbarth Livestock, YELL-10638.

Comment 6

“Not only is eradication of this disease from the United States important because of the economic impacts on livestock production, but also because this disease is a threat to public health. Having worked closely with Mexico on the brucellosis eradication program, I am intimately aware of the adverse effect on people who are infected with brucellosis. This is a serious zoonotic disease.” - Public Agency, Arizona Department of Agriculture, YELL-13033.

Comment 7

“The DEIS contains a chart predicting the measurable change in seroprevalence in bison in Yellowstone as the result of the use of a vaccine. There is no vaccine in existence for bison. While the effects of a vaccine can be predicted, the decision to be made by the Cooperators should be based on the tools available at the writing of this decision document and available to implement this plan this winter. Chart 3, page xv, should be deleted from the plan. The focus of the management should be the management of risk by the separation of bison and cattle and the vaccination of the cattle existing adjacent to the Yellowstone Park.” - Tribe, Nez Perce Tribe, YELL-11409a.

Comment 8

“Furthermore, the agencies are well aware of techniques to reduce whatever risk exists by closing down snowmobile trails, removing cattle from public lands, and requiring the vaccination of cattle against brucellosis, but have failed to implement these sensible and feasible solutions.” - Individual, Chicago, IL, YELL-13077.

Comment 9

“Definition of Risk. The DEIS claims that because the Yellowstone bison carry brucellosis, cattle are at risk of contracting the disease. The DEIS presents no conclusive scientific research that determines exactly what the risk is, and there haven’t been any documented cases of transmission between cattle and bison in the wild. How can the agencies manage the risk of the disease transmission when they don’t even know what level of risk, if any, exists? Even if brucellosis were eradicated from bison, elk could still be a potential source for reinfection. The DEIS states this and does not include the risk between other wildlife and bison. The actions in the DEIS will detract from the objective of eradicating disease in the Greater Yellowstone Ecosystem. The idea of managing disease this way is not cost-effective and proves to be unsuccessful because elk will transmit it back to bison. If the true purpose of this DEIS is to address the risk of brucellosis transmission then the InterAgency Team needs to include elk and other wildlife that may transmit brucellosis in its DEIS. This issue is not beyond the scope of the DEIS. All the management tools in each alternative have not been approved yet by the agencies and may never be approved. The DEIS assumes that these actions will be approved. - Organization - the Ecology Center, YELL-15671.

Comment 10

“In order to address the risk of transmission, not only must the risk be quantifiable, which it is, but an acceptable level of risk must be defined. In this case, the agencies have never defined what level of risk is acceptable. Would it be acceptable to the agencies if the herd infection rate was 5 percent, or the number of potentially infectious female bison was less than 5 in the entire herd? The agencies fail to define what constitutes an acceptable level of risk because they (principally the MDOL and the USDA) have concluded that the only level of acceptable risk is no risk at all.

Clearly, this objective is unrealistic, but, unfortunately, the livestock agencies and industry appear to be unwilling to accept anything less. If the DEIS is intended to address the risk of transmission, the risk must be quantified and the agencies must agree to an acceptable level of risk.” - Business, - Schubert and Associates for Fund for Animals, YELL-14714.

BRUCELLOSIS - PRESENCE IN YELLOWSTONE BISON HERD

119 comments. The comments generally supported eliminating brucellosis from the bison herd in Yellowstone National Park. However, numerous comments indicated that total eradication within the herd is not possible. Still others indicated that the bison herd in Yellowstone represents the last hurdle in eliminating brucellosis from the United States. Still other comments stated that brucellosis is spreading rapidly in the park, while others stated that bison have never been documented to transmit brucellosis to cattle. Related issues can be found in the four following sections and in Cattle-Brucellosis Class-Free Status and Wildlife-Brucellosis in other Wild Ungulates.

Comment 1

“... it is imperative that the National Park Service develops an active program to eliminate Brucellosis from Yellowstone National Park bison. This disease will not go away by itself and it also poses a risk to humans that come in contact with aborted feti and to any neighboring cattle or bison herds in the area.” - Public Agency, Georgia Department of Agriculture, YELL-11108.

Comment 2

“Total eradication of brucellosis as a goal is more a statement of principal than a workable program at present; neither sufficient information nor technical capacity is available to implement a brucellosis-eradication program in the Greater Yellowstone Area... It might prove impossible for various reasons to eliminate brucellosis from bison to elk in the Greater Yellowstone Area.” - Individual, Jackson, WY, YELL-10319a.

Comment 3

“The 60 year and over \$30 billion struggle to eradicate brucellosis from the United States is nearing completion. There are only 12 infected cattle herds in the U.S. and the brucellosis problem in the Greater Yellowstone Area (GYA) represents the most significant hurdle to eradication.” - Organization, National Cattlemens Association, YELL-11138.

Comment 4

“It is unfathomable to this organization that on page 20 of the DEIS that it is indicated “that brucellosis may be endemic in the bison herd but few animals are capable of transmitting the disease.” How does the NPS explain that 37.5% of the bison that were seropositive and were shot or euthanized between March 1995 and January 1997 were culturally positive. This indicates

37.5% are spreading the organism and that percentage is not only significant but frightening. The DEIS must be corrected to reflect this science. In addition, it appears about 50% of the bison herd are seropositive and this would indicate not only is brucellosis transmissible, it is occurring rapidly and massively in this herd. Again the DEIS must reflect the science of the issue, not word smithing by those who do not want anything done about the disease.” - Organization, Idaho Farm Bureau, YELL-11433.

Comment 5

“...there has not been a reported case of brucellosis being transmitted from an infected bison to any domestic livestock....” - Individual, Boulder, CO, YELL-14917.

BRUCELLOSIS - TESTING

1,355 comments. Some comments indicated that testing should be paid for by both landowners and the government. Several comments voiced concern over vaccinating bison which makes them test positive for brucellosis and increases the potential for them to be slaughtered if they roam out of the park. Others were concerned about using an unproven test on bison to detect brucellosis. Still others suggested the use of additional test methods, and additional research.

Comment 1

“Vaccinated animals will test positive. While there is no vaccine for bison and elk for brucellosis at the time this DEIS is written, the Nez Perce Tribe hopes one will be developed soon. However, the use of a vaccine will require changes to the protocol regarding which animals to slaughter in the future. According to the National Academy of Science reports a serum test for brucellosis will document the active pathogen of brucella antibodies. The introduction of a vaccine to the bison population would make all the animals vaccinated test positive. A serum test, therefore, cannot be the basis for a decision of whether or not to slaughter vaccinated animals. Many of the alternatives in the DEIS that contain vaccination programs also call for the slaughter of animals that test positive. It appears to us to be a self fulfilling prophecy to decide to slaughter all animals that test positive and then introduce an agent, into as much of the population as possible, that cause animals to test positive for brucellosis.” - Tribe, Nez Perce Tribe, YELL-11409a.

Comment 2

“Using an unproven test on bison for brucellosis to decide whether the bison should be slaughtered is a disgrace.”- Individual, Burlington, NJ, YELL-13329.

Comment 3

“Rapid tissue testing could use fluorescent antibody methods...Only tissue-positive-for-Brucellosis animals should be slaughtered. (That requires, of course, a muscle biopsy that can be obtained if the animals are either corralled or tranquilized.” - Individual, Cody, WY, YELL-102.

Comment 4

“State vets testified they want to test and slaughter first bison and then elk for brucellosis inside Yellowstone National Park. This means they will kill all positive bison, even one that cannot spread the disease. I believe this policy should not be implemented. I oppose the testing and slaughter of any and all wildlife in Yellowstone or any National Park.” - Individual, Mundelein, IL, YELL-10302.

DEFINITION OF LOW RISK

115 comments. The main issue is contention between the federal government’s (APHIS) definition of "low risk" and the different definition used in Montana (which is not defined in the DEIS). Five comments specifically supported Montana’s definition of low-risk and 52 comments opposed Montana’s definition. Comments questioned the appropriateness of the Montana Department of Livestock being able to provide their own risk criteria.

Comment 1

“Montana should accept the federal definition of ‘low-risk’ buffalo and allow them free movement like elk and other wildlife.” - Individual, Derby, OR, YELL-10604.

Comment 2

“Several of the alternatives in the DEIS would impose a revised definition of ‘low risk’ bison on the state of Montana. The revised definition would result in large numbers of brucellosis-exposed or infected bison in expanded SMAs where the potential contact with cattle will be increased. The DEIS inaccurately assumes that other state animal health officials will accept Montana cattle if this definition is imposed on Montana.” - Public Agency, State of Idaho Governor, YELL-11121.

Comment 3

“The Animal and Plant Health Inspection Service (APHIS) should initiate a NEPA review of their policy on brucellosis-free status. This review would be on a national scale. ...Another supporting reason for an open discussion of the APHIS policy of brucellosis-free status is the level of concern about accepting APHIS’ low risk definition of brucellosis transmission among Montana’s livestock industry. This is further supported in that APHIS has indicated that this definition will not threaten Montana’s brucellosis-free status, yet the level of concern remains...” - Public Agency, Environmental Protection Agency, YELL-14356.

Comment 4

“Similarly, the type of bison meeting the Montana State Veterinarian’s definition of ‘low risk’ must be spelled out in the DEIS now. We have no faith in the State Vet. We have seen many bison die unnecessarily in Montana, bison incapable of spreading brucellosis to each other, let

alone cattle. APHIS has provided its definition of low risk to Montana. If that definition is unacceptable to Montana, their perspective, based on scientific fact, should be provided in the DEIS. Without revealing what is scientifically incorrect with the proposed APHIS definitions in the DEIS, the only conclusion the public can rationally draw is the state vet seeks to make risk management determination a political decision and leverage his power to the maximum extent possible. This is unacceptable to the public and should be unacceptable to all scientifically trained professional wildlife and livestock managers. Once again, in the absence of meaningful discussion of the merits of the APHIS definitions and decision in this DEIS of what constitutes low risk bison, public participation is undermined. We demand that the Governor of Montana personally assure the public of their opportunity to participate in, comment on, and appeal if necessary, any and all decisions made by the state of Montana, listed as discretionary in this DEIS. Without this assurance, the public will continue to be left out of the process of management of public trust resources and those decisions will continue to be made by perverting science and leveraging the political power of the state vet. - Organization, National Wildlife Federation, YELL-14819.

HUMANE TREATMENT

4,924 comments. Most comments indicated that capture, slaughter, shooting, hunting, quarantine, and vaccination of wild bison constituted inhumane treatment. Handling bison in ways similar to cattle was considered inappropriate for the wild animals. Capture and quarantine was considered inhumane by some comments because it was foreign to the nature of free-roaming animals. Most comments (4,832) supported the Bison Alternative (discussed under the Alternatives topic earlier) as a humane alternative. Related comments can be found in Bison - Capture/Test/ Slaughter Operations and Agency Shooting.

Comment 1

“If the state feels that the bison population must be curtailed, immuno-contraception is a feasible and humane alternative to hunting.” - Individual, Belmar, NJ, YELL-10267.

Comment 2

“The quarantine protocol found in Appendix B is too costly, severe and inhumane. APHIS must develop and approve a more reasonable quarantine protocol, similar to its quarantine protocol for cattle.” - Individual, Roseland, FL, YELL-10318.

Comment 3

“The plan to move bison to Native American reservations is a humane way to resolve this shameful situation...” - Individual, Phoenix, AZ, YELL-10351.

Comment 4

“If bison threaten private lands or human safety, it is reasonable to adopt non-lethal, nonrestrictive methods of removal.” - Individual, Rio Rancho, NM, YELL-10397.

Comment 5

“A more humane approach should be undertaken which would prohibit the use of snowmobiles which prepare exit trails, alter the practice of cattle grazing on public lands, purchase of strategic private lands and dismantle the capture facility within the park.” - Individual, Scotia, NY, YELL-10477.

Comment 6

“Despite positive vaccination studies on calf elk with vaccine strain 19, the fear it would spread to livestock is escalating to the point of inhumane slaughter of uninfected migrating buffalo.” - Individual, Busby, MT. YELL-10700.

Comment 7

“To control the risk of brucellosis transmission to cattle, the most cost-effective, humane action to take is to vaccinate the cattle at risk.” - Individual, North Oaks, MN, YELL-10796.

Comment 8

“(Hazing) used mostly during the spring time, this has an adverse impact on pregnant females that are ready to give birth.” - Organization, The Ecology Center, YELL-15575.

CAPTURE/TEST/SLAUGHTER OPERATIONS, AGENCY SHOOTING

31,146 total comments; 19,394 comments opposed these activities and 10,020 supported them as means of controlling herd size. Most supportive comments urged the agencies to find a management plan that does not confine or kill (in any form) more bison. Other common themes in these comments included; stop the slaughter, vaccinate cattle, allow the buffalo to roam free, remove excess buffalo to Indian reservations, buffalo are wildlife not livestock and should be managed by professional wildlife managers, create wildlife migration corridors which will allow a safe area for bison to roam, and run Yellowstone National Park as a natural park, not a zoo. A major issue was the location for proposed facilities. Locating criteria include inside versus outside the park; close to bison herds to minimize transportation stress; and far away from cattle grazing locations. Possible locations suggested by comments included adjacent to the capture facilities at Stevens Creek and at Seven Mile Bridge; in the Lamar Valley at or near the ‘Buffalo Ranch’; or in the Madison River area near the west boundary of the Park. Related comments can be found under Bison - Hunting and Bison - Humane Treatment.

Comment 1

“I oppose the ‘Preferred Alternative’ recommended by the state of Montana and the federal government. The Government plan continues the unnecessary killing of buffalo moving to public lands outside the park in winter.” - Individual, Parker, CO, YELL-10002.

Comment 2

“I believe that even alternative five (aggressive brucellosis control within Yellowstone National Park through capture, test, and removal) is superior to alternative seven. With alternative five, you have a large initial killing of the herd, but it would leave a brucellosis-free herd.” - Individual, Marshall, IL, YELL-10005.

Comment 3

“...Yellowstone Park’s errant buffalo should be hunted, not slaughtered.” - Individual, Bozeman, MT, YELL-10041.

Comment 4

“The entire bison-management program set forth in the EIS including tagging, testing, slaughtering the ‘seropositive’ bison, pending grazing allotments, and so forth is based on poor science.” - Individual, New York, NY, YELL-10068.

Comment 5

“A solution is to keep the bison away from ranchers’ cattle using humane alternatives, i.e. fences, plants they dislike, etc.” - Document YELL-13163, no name.

Comment 6

“Buffalo require the freedom to roam on public lands adjacent to Yellowstone in order to find forage during harsh winters. The Park Service should acquire additional land outside of Yellowstone to support bison migration and winter ranges.” Individual, Madison, WI, YELL-16572.

DISTRIBUTION OF CARCASSES

125 comments. The past distribution of carcasses created as much ill will as good results. Eight comments specifically supported the current distribution methods while 38 comments specifically opposed the plan. Issues raised included how bison were to be killed, how soon the dead bison could be retrieved, who was to be allowed to recover the carcasses, how carcasses were to be handled, whether preferential treatment was given to any persons or groups, or should preferential

treatment be given to any persons or groups, and record-keeping of carcasses should be accurate to avoid recriminations among recipients. If Montana derived significant monies from the sale of bison parts and meat, should all or part of those monies be returned to the U.S. government who "supplied" the bison. If bison are to be slaughtered, then all meat and parts should be offered for sale to the public at fair market value. However, some comments stated that no live animals should be sold as it is inconsistent with the public trust. It was also asked why, if bison are to be removed from the area, should they not be recycled into the greater Yellowstone ecosystem (leave the carcasses in the wild).

Comment 1

"Disposition of Slaughtered Animals. The 11th paragraph under the heading entitled 'Features Common to All Alternatives' on page 6 of the Summary simply states: ...Live bison will be available if they had completed the approved quarantine protocol." There are several concerns raised by the attitude embodied in the summary the Cooperators [agencies] need to address. The basic concern is that there will be a competition for scarce resources (harvested bison) and the mechanism whereby the Cooperators or a lead agency will decide how the animals are to be distributed is not delineated." - Tribe, Nez Perce Tribe, YELL-11409a.

Comment 2

"Indians or tribes should not get preferential treatment over other U.S. citizens for live animals, meat, or hunts outside the park." - Individual, MT, YELL-13129.

Comment 3

"Regardless of alternative, the DEIS must commit to utilizing any bison destroyed as a consequence of prescribed management to the fullest extent possible for research purposes. For example, APHIS and USDI scientists must continue to examine the relationship between blood test-positive bison and culture-positive bison for any and all bison killed from management actions. Examination of the reproductive tract to determine any compromised fetus' must be carried out. The public must be assured that as much information as possible is collected and disseminated to the public regarding the status of the disease and its impact on this public bison herd. Native American tribes must be the ultimate recipients of any destroyed bison. Bison parts should not be auctioned off by Montana." - Organization, National Wildlife Federation, YELL-14819.

Comment 4

"...The EIS documents the number of bison killed outside the park and estimates of the number of carcasses provided to Tribes during certain years. However, during implementation of the Interim Management Plan, more than half of the bison removed from the park went to other entities, with several hundred bison slaughtered and sold by the Montana Department of Livestock. We find the recent slaughter and sale of these bison, which are the property of all people of the United States, by the Department of Livestock both unacceptable and a poor example of how we

should be managing what is probably the last remaining free-ranging bison population. The DEIS also fails to quantify the effects of potential jobs lost in Indian country, because of state slaughter and sale of sero-negative bison, as well as the loss in hides, meat and other parts to Indian communities not to mention the potential live animals lost that could have gone to build Tribal and/or public herds.” - Tribe, Montana Tribal Fish & Wildlife Commission, YELL-15363.

Comment 5

“GYC has significant concerns about government shooters killing bison, and the disposition of bison carcasses. GYC reviewed records provided by the Department of Livestock regarding disposal of bison shot by agency personnel in the field. According to the DOL, it is responsible only for gathering and disposal of offal, and the group receiving the meat in the field is responsible for everything else. We find it irresponsible for the DOL to take such a cavalier approach to the disposal of hundreds of slaughtered wild bison that migrated from Yellowstone National Park. It is but one more reflection on the inappropriateness of having a livestock agency responsible for wildlife management, and having agency personnel shooting wild animals.” - Organization, Greater Yellowstone Coalition, YELL-15420.

Comment 6

“We even discussed the applicability of Tribal sovereignty, with the reservation being a federal reservation. And the animals being transported from one federal reservation to another federal reservation. What the up-shoot of that was, was we had the state vets saying yeah, you can do that, but [we] will quarantine the reservation once they get there.” - Individual, SD, YELL-17714.

DISTRIBUTION OF LIVE BISON

43,884 comments. The predominant theme of almost all comments was to relocate migrating bison rather than killing them. 2,648 comments supported distribution of live bison while 19 comments specifically opposed it. A large proportion of the comments also urged that bison be transferred to tribal organizations. Many comments indicated the selected management plan must determine the fate of migrating bison and not the Montana Department of Livestock. Other comments indicated that various bison herds on public lands across America could be the recipients of bison from YNP. Public lands adjacent to the park should be allowed as range for the bison up to a scientifically determined carrying capacity. Any transfers of live bison should be to another public entity. Relocation of bison is stressful, so it should be conducted only when absolutely necessary. Relocation back into the park was recommended as an acceptable relocation technique. Some comments said relocation was not a preferred management tool except when needed to protect lands or human safety. Finally, many comments referred to the Citizen’s Plan alternative as a preferable plan for the distribution of live bison (i.e., to Tribal lands or public lands).

Comment 1

“If removal of bison is still necessary, we should relocate these animals to Indian reservations or other public lands where they will not be ruthlessly killed.” - Individual, Oregonia, OH, YELL-10022.

Comment 2

“Any live transfers of health, certified brucellosis-free buffalo must be to public entities, i.e. tribal governments, public land or public wildlife management agencies. These buffalo are a public resource and must not be sold and privatized by Montana.” - Individual, Albuquerque, NM, YELL-10150a.

Comment 3

“Once the carrying capacity is determined, the size of the herd should be kept at that carrying capacity by utilizing buffalo for such purposes as replenishing the gene pool on Indian Reservation herds in the Montana area.” - Individual, Missoula, MT, YELL-10256.

Comment 4

“An option for live removal of buffalo to a health certification center or quarantine facility must be included.” - Individual, Galloway, OH, YELL-10280.

Comment 5

“I am opposed to shooting the bison; the bison should be transported back into the park. If private landowners wish to keep wild animals off their lands, then they should fence their lands.” - Individual, Turlock, CA, YELL-10317.

VACCINATION OF BISON

1,251 total comments; 685 opposed vaccination, while 518 supported the procedure. Several comments favored a safe, effective, non-intrusive vaccination of bison, but not until efficacy has been demonstrated. A similar number of comments specifically stated that they preferred the vaccination of cattle. A few of the comments suggested vaccinating both species. The reasons against vaccinating bison included their designation as wildlife, high costs, and the belief they should not be captured, quarantined, nor slaughtered. See related comments in Cattle Vaccination - requiring RB51.

Comment 1

“WE are very opposed to the capture, slaughter, hunting shooting, quarantine, and vaccination of the Yellowstone bison.” - Individual, Florissant, MO, YELL-10028.

Comment 2

“Non-intrusive vaccinations would be appropriate.” - Individual, Bloomington, IN, YELL-10092.

Comment 3

“Bison should not be vaccinated like domestic livestock.” - Individual, Boulder, CO, YELL-1032.

Comment 4

“...cattle should be vaccinated against Brucellosis and the buffalo should be vaccinated when a safe and effective non-invasive vaccine is available.” - Individual, Galloway, OH, YELL-10280.

Comment 5

“There is no need to spend millions of dollars to corral, confine, haze, test, slaughter, quarantine and shoot bison....” Individual, Rio Rancho, NM, YELL-10397.

Comment 6

“I endorse the Citizens’ Plan to Save Yellowstone Buffalo...Allow vaccination of buffalo within the special management area, when the vaccine is safe and effective for buffalo and can be administered in a non-intrusive manner.” - Individual, Alexandria, VA, YELL-2979.

Comment 7

“Further research into the development of an effective vaccine against brucellosis for bison. - Organization, Humane Society of Tampa Bay, YELL-6881.

Comment 8

“Please implement the “Bison Alternative Recommendations”...5). Do not vaccinate wild bison. Vaccination is impractical, prohibitively costly, wasteful, unnecessary, and ineffective.” - Individual, Toronto, Canada, YELL-10442.

Comment 9

“I support Plan B, ‘the Buffalo’s Only Alternative’...Promote responsible disease control by developing a strong vaccination program for bison and local cattle...” - Individual, Missoula, MT, YELL-14740.

Comment 10

“...Strain 19 appears to be more virulent in bison than in cattle and caused a high incidence of abortion when given to pregnant bison. It also causes, as I said, a positive blood test. So when the stock growers call for test and slaughter and vaccination with Strain 19, what they are going to do is kill all of the positives, inject the negatives with strain 19, which will turn them into positives next year.” - Organization - National Wildlife Federation, YELL-15131.

QUARANTINE OPERATIONS

5,336 total comments; 1,973 opposed quarantines while 3,297 supported such operations. It appears part of the support for quarantines comes from comments supporting the Citizen’s Plan, an alternative which includes provisions for quarantine. The majority of comments not supporting quarantine, were also against capture, slaughter, and vaccination of bison. Reasons for being against quarantine, included the costs of building quarantine facilities and holding the bison, especially when compared to the reported low risk of brucellosis transmission. Comments stated it was unnatural to corral migratory animals and that confinement caused them undue stress and they injured one another. Other comments said only pasture type quarantine facilities should be used, that the existing facilities are inhumane.

Comment 1

“I strongly protest the proposed capture, slaughter, agency shooting, public hunting, quarantine, and vaccination of buffalo.” - Individual, Morganville, NJ, YELL-10456.

Comment 2

“The quarantine protocol found in Appendix B is too costly, severe and inhumane. It is Montana’s way of assuring that no buffalo will make it out of quarantine alive. Any quarantine must be based on a pasture system rather than a system of small holding pens as proposed. APHIS must develop and approve a more reasonable quarantine protocol, similar to its quarantine protocol for cattle.” - Individual, Albuquerque, NM, YELL-10150a.

Comment 3

“... a multi-million dollar quarantine facility for Yellowstone’s bison will be a waste of federal and state taxes and is unnecessary. Plus rifle hunting of Yellowstone’s bison is unethical and unsporting and should be prohibited.” - Individual, Middlebury, CT, YELL-10385.

Comment 4

“An option for live removal of buffalo to a health certification center or quarantine facility must be included. Finally, any excess population must be removed and placed on other public lands and/or taken to Indian reservations, allowing Native Americans to preserve the Buffalo live.” - Individual, Galloway, OH, YELL-10280.

Comment 5

“...Utilize an approved quarantine facility for seronegative bison captured at the Seven Mile Bridge and Stevens Creek. The quarantine facility could also be used as part of the ‘adaptive management’ strategy to evaluate the effectiveness of vaccines such as RB51 in seronegative adult bison and gain practical knowledge about the vaccine. A quarantine facility should be constructed and put into operation as soon as possible [if] it is to be an effective alternative to destruction of seronegative bison. The facility should be located in an area that is far removed from cattle herds. The current Brucellosis Uniform Methods and Rules requires the facility to be located within or adjacent to YNP or Grand Teton National Park...” - Organization, U.S. Animal Health Association, YELL-9364.

Comment 6

“Third, the quarantine protocol is inordinately restrictive. The protocol which was principally designed by the USDA, along with state veterinarians and livestock industry officials affiliated with the U.S. Animal Health Association, establishes procedures and guidelines for bison quarantine which are far more restrictive than the current quarantine standards for cattle... it is possible that no bison may ever be released from quarantine. Some believe that this was the intent of the livestock agency and industry officials who designed the quarantine.” - Organization, Florida Biodiversity Project, YELL-9382

Comment 7

“The Interagency Buffalo Management Team thinks that the quarantine of Yellowstone Buffalo will only affect ‘individual buffalo.’ ‘By quarantining, family members will be separated. Social structures will be destroyed or severely disrupted. Natural patterns of land use may be broken. And, knowledge that is normally passed on from generation to generation within the herd may be lost,’ states Virginia Ravndal, wildlife biologist.” - Organization, Wild Rockies Infonet, YELL-15545.

Comment 8

“According to your own calculations, on average, 50 bison would go into quarantine in any given year. Even in the best case scenario, which is totally unrealistic, each of the 46 member tribes of ITBC could expect to get, at most, one bison out of a quarantine year. Clearly, this will not help tribes to build their herds in any real way, the only purpose it serves is a political one - it allows you to say you are helping Indian people. Many traditional Indian people are very much against the methods you propose and do not want to see Yellowstone buffalo treated like livestock.” - Individual, YELL-13321.

BISON ECOLOGY

763 comments. Most of the comments related to the fact that the bison are free-roaming and an integral part of the ecosystem. Other comments referred to the fact that additional scientific research is needed on bison ecology, especially their relationships with wolves and grizzly bears, prior to implementation of a plan.

Comment 1

“The wild bison are an integral part of our natural heritage, and an important part of the greater Yellowstone Ecosystem, one of the last intact temperate ecosystems in the world. They are much more important and valuable than the local cattle and economic interests.” - Individual, Germantown, MD, YELL-10557.

Comment 2

“Better scientifically based research needs to be made on the carrying capacity of the Greater Yellowstone Ecosystem for bison.” - Individual, St. Cloud, MN, YELL-10386.

Comment 3

“They have been a part of the greater eco-system for thousands of years. We must preserve and protect this heritage.” - Individual, Olympia, WA, YELL-10016.

Comment 4

“Managers allowed poaching in the first two decades after Congress designated Yellowstone a National Park to drop the population of bison from 400 animals in 1893 to 24 in 1897. Park managers then brought 18 animals from private, relict herds elsewhere to rescue the Park’s mountain bison. This did irreparable damage to the Yellowstone herd. This was a population of mountain-dwelling bison geographically isolated from its plains-dwelling cousins. According to John Craighead, Ph.D., in chapter two of his monograph on Yellowstone’s grizzly bears, the bison’s isolation ‘probably had conferred a degree of genetic distinction which today would be considered worth preserving.’ Lets not do this again.” - Individual, Missoula, MT, YELL-836.

Comment 5

“Each killing damages the genetic resiliency of the bison as endangered species.” Individual, Albuquerque, NM, YELL-2014.

Comment 6

“Decreasing the numbers of bison available for grizzly bear consumption could increase grizzly-human conflict, which in the past, has been the prime reason grizzlies have had to be removed and killed.” - Individual, Boise, ID, YELL-9366.

POPULATION

9,745 comments. Many of the comments referred to determining the carrying capacity of the park, adjacent lands, and the Greater Yellowstone Ecosystem prior to implementing any population controls. Comments also stated these numbers need to be developed scientifically rather than politically. Many comments stated that plans must allow for natural fluctuations of the herd within the park. Several comments indicated that limited public hunting should be used to limit the herds outside of the park that exceed the carrying capacity, while other comments favored immuno-contraception to control herd numbers and transfer of bison to Indian Reservations. Related comments can be found in Population with an Upper and Lower Level and Vegetative Communities.

Comment 1

“Determine the amount of bison that can be sustained in the Yellowstone area.” - Individual, Tamarac, FL, YELL-10079a.

Comment 2

“Science, not politics, must be the basis for goals set for the Buffalo population.” - Individual, Galloway, OH, YELL-10280.

Comment 3

“It is vital to allow Buffalo the freedom to roam on public lands adjacent to the Park up to the “carrying capacity” of these adjacent lands. The Park Service should acquire additional winter range adjacent to the Park by purchase, conservation easements, and modified grazing allotments.” - Individual, Madison, NJ, YELL-10272.

Comment 4

“There is no scientific justification for limiting the size of the bison herd. The size of the herds should be dictated by natural factors. The livestock industry should not be a determining factor in how large the herd should be.” - Individual, Ashville, NC, YELL-10434.

Comment 5

“Determine an ecologically based carrying capacity for the bison in Yellowstone. If it’s exceeded, consider opening a hunting season.” - Individual, St. Louis Park, MN, YELL-10260.

Comment 6

“Population objectives need to be established for the bison of Yellowstone. There needs to be solid rationale for the objectives established, they should be based primarily on habitat.” Individual, Cheyenne, WY, YELL-2323.

POPULATION WITH AN UPPER AND LOWER LEVEL

4,056 total comments; 3,582 (88%) opposed limits and 470 (12%) favored them. The majority of comments stated that the population limits of 1,700 and 2,500 animals were not acceptable. The comments indicated that these numbers had been reached arbitrarily and were not based on scientific data and that a carrying capacity needs to be determined. Many other comments were opposed to setting any limits on the herd size within the Greater Yellowstone area. Some comments indicated that the herd size should be allowed to fluctuate naturally. Still others did not want any population limits determined in the document. A few comments indicated that the upper limit of 2,500 animals was too high. Other comments indicated that a population of 1,700 head was too low, others said 3,500 was acceptable within the Park. Related comments can be found in Population and Vegetative Communities.

Comment 1

“The (preferred) alternative is flawed because it calls for the reduction of the population to 1,700 - 2,500 — numbers that are not based on scientific or ecological factors. Studies have shown that the number could fluctuate up to 3,500 animals based on forage and winter severity.” - Individual, Oliver Springs, TN, YELL-3918.

Comment 2

“There should be no population objectives established for the Yellowstone bison herd. One alternative in the EIS calls for, without any scientific justification, limiting the size of the bison herd between 1,700 and 2,500 animals. The size of the herd should be dictated by natural factors, not by bullets, by slaughter, or by the desires of the livestock industry.” - Individual, New York, NY, YELL-321.

Comment 3

“In my view, there is no justification in the EIS what so ever, for the maximum number of 2,500 bison recommended in Alternative 7, the agency preferred alternative. No maximum bison numbers should be established in the final bison management plan.” - Individual, Sheridan, WY, YELL-11159.

Comment 4

“Bison should be allowed to roam freely on the public lands of the Greater Yellowstone Ecosystem until an ecologically based, peer-reviewed carrying capacity for the bison has been established. Bison movement and resource utilization outside the Park should be studied over the next ten years to determine the carrying capacity. Until a carrying capacity is established, no population control methods should be implemented.” - Individual, Missoula, MT, YELL-11126.

Comment 5

“Keeping the bison in a specified number group, allows a consistency and adds a balance between agencies.” - Individual, No Location, YELL-11280.

Comment 6

“We now have the National Park Service who is very much overgrazing the parks. There must be a cap on the number of bison...” - Individual, Malta, MN, YELL-14831.

SPECIAL MANAGEMENT AREAS (SMA)

7,221 comments. The issues were whether SMAs should be created as part of the overall management plan for bison, how should they be managed, and how should boundaries be established. Approximately 80 percent of the comments supported the formation of SMAs and 20 percent were opposed. Support for SMAs centered on the rationale that the adjacent lands are public lands designated for wildlife use and they should be used to support the bison in winter time. Many comments indicated if the Yellowstone bison herd is to be free roaming, then SMAs will be necessary for their seasonal migrations to important winter range. Some comments indicated the need to identify the carrying capacity of the SMAs to prevent their overuse, and some supported the acquisition of private lands to be part of the SMAs. Changing cattle operations and vaccinating cattle in the SMAs was frequently mentioned as ways to make the SMAs successful.

Opposition to the use of SMAs centered on the potential for spreading out the bison herd and increasing the risk of spreading brucellosis infection. SMAs were thought to enlarge the area of concern and delay management decisions while increasing the brucellosis risk to higher numbers of livestock. The cost to acquire and manage the SMAs was also mentioned as a reason for opposition. Some opposition to SMAs may have resulted from the illustrations in the DEIS in

which SMA boundaries were shown to be large, but areas that bison would actually occupy were only small portions of the SMA. The issue resulted from unanswered questions concerning who would manage the SMAs (and the bison ranging on them) if SMAs were implemented, particularly because private and public lands would be involved. Entities that were subjects of comments included the Montana State Veterinarian, APHIS, and the Montana Department of Fish, Wildlife and Parks.

Another issue was whether SMAs are an appropriate use of public lands adjacent to the Park. Supportive comments tended to request/insist that SMAs be created large enough to provide for winter migration for forage by the bison because the lands represented their historical range. Opposing comments rejected the entire concept of SMAs as not being authorized by the Interim Management Plan or that the SMA would represent a *de facto* enlargement of the Park, or that the bison should be restricted to the Park. Related comments can be found in BISON and OBJECTIVES AND CONSTRAINTS, Effect on Free-Ranging Status and Distribution and Land Acquisitions or Easements.

Comment 1

“I am in favor of removing cattle completely from all public land areas within the SMAs.” - Individual, Wichita, KS, YELL-10583.

Comment 2

“Under Plan B, the Yellowstone bison herd would be truly free-roaming, not merely, as the government proposes, free-roaming within the confines of a park demarcated on the basis of political (not ecological) boundaries and a few so-called "special management areas". And Plan B strongly opposes maintaining the herd within the confines of a "pasture-like" quarantine facility (as some have proposed).” - Individual, Corvallis, MT, YELL-10692.

Comment 3

“If one wanted to increase the problem [brucellosis], you would create an SMA. The inclusion of SMAs makes one wonder about the goals of the National Park Service. The use of SMAs with a severely Brucella-infected herd of bison begins to look like a potential land acquisition plan by the Park Service.” - Organization - Veterinary Medicine Extension-Univ. CA., YELL-11057.

Comment 4

“...allowing buffalo on public lands within the SMAs cannot and must not be subject to the daily whims and arbitrary discretion of the Montana State Veterinarian.”- Individual, Albuquerque, NM, YELL-10150a.

Comment 5

“However, if the state veterinarian had the authority to revoke an SMA or change the time lines of use if other states or APHIS threatened to remove Montana’s class-free status, we may support this as an acceptable option.” - Organization - Utah Farm Bureau Federation, YELL-14886.

Comment 6

“Creating a SMA of public lands outside the Park where buffalo can survive harsh winters, and where they will be managed by wildlife professionals.” “Transfer management authority over wild buffalo back to the Montana Department of Fish, Wildlife and Parks.” - Individual, Arvada, CO, YELL-3363.

Comment 7

“The special management agency can monitor herds and round them up when significant numbers [cross the] boundaries.” - Individual, Athens, GA, YELL-131.

Comment 8

“One of the alternatives (alternative 2) in the DEIS includes a very large Special Management Area (SMA) in the West Yellowstone area where untested, brucellosis infected and exposed bison would be allowed free access to the lands of the SMA. Over 20 miles of the southern boundary of this SMA is identified as the Idaho/Montana border. The DEIS is deficient in identifying this boundary for the SMA in that the alternative directly impacts the state of Idaho and the Idaho state agency which has statutory responsibility for bison was not consulted in development of the DEIS or the alternative. The DEIS assumes that the state of Idaho is willing to accept the responsibility for policing this boundary area and addressing the diseased bison that move into Idaho through this boundary area. Such an assumption is inaccurate. This alternative would potentially result in exposure to large numbers of Idaho cattle to brucellosis infected bison. The alternative is not acceptable to the state of Idaho and we contend it could not be legally implemented.” - Public Agency, State of Idaho, Governor’s Office, YELL-14305.

LAND ACQUISITIONS OR EASEMENTS

32,537 total comments; 31,874 supported acquisition or easements, while 69 opposed these activities. A great majority of comments were in favor of acquiring winter range outside of the Park. The comments state that the lands should be obtained by purchase or through easements, and that grazing practices should be modified on public lands. However, a few of the comments opposed acquiring lands outside of the Park primarily because of perceived costs to the taxpayer or increased areas subject to transmission of brucellosis. Related comments can be found in BISON - Effects on Free-Ranging Status and Distribution and Special Management Areas.

Comment 1

“To counteract the spread of brucellosis, we must keep buffalo and cattle separated. Get the cattle off the buffalo winter ranges on the Gallatin National Forest...we must go about acquiring additional winter range in the Gardiner and West Yellowstone basin areas.” - Organization - Gallatin Wildlife Association, YELL-15149a.

Comment 2

“It’s vital to allow buffalo the freedom to roam on public lands adjacent to the Park up to the carrying capacity of these adjacent lands. The Park Service should acquire additional winter range adjacent to the Park by purchase, conservation easements and modified grazing allotments.” - Individual, Greenville, WI, YELL-1013.

Comment 3

“The plan should provide for no - repeat no - further land acquisition outside the Park. Expansion of acreage is not a crutch for management. The Park Service, as well as the Bison herd, must adjust to live within its acreage means.” - Organization, National Coalition for Public Lands and Natural Resources, YELL-10316.

Comment 4

“As a concerned citizen, I write to urge consideration and approval of the Citizen’s Plan for the protection of bison in and around Yellowstone Park. Bison require freedom to roam on public lands adjacent to the Park. State and federal agencies should obtain additional winter range land next to the Park if need be...” - Individual, Fort Plain, NY, YELL-10086.

EFFECTS ON FREE-RANGING STATUS AND DISTRIBUTION

13,199 Comments. The comments predominately favored allowing the bison to roam freely within the Greater Yellowstone area. The major issue was how the proposed alternatives would change/restrict bison movements from their current patterns. Related comments can be found in BISON - Special Management Areas and Land Acquisitions/Easements.

Comment 1

“My desire, and I think I speak for thousands of other Americans, is for wild, free-ranging buffalo to inhabit Yellowstone in perpetuity. Their lives and their freedom should not be sacrificed to benefit the self-interest of a few individuals.” - Individual, Casper, WY, YELL-10029.

Comment 2

“Those that venture onto private lands could be shot under state wildlife damage provisions.” - Individual, Marton, TN, YELL-1022.

Comment 3

“It is vital to allow buffalo the freedom to roam on public lands adjacent to the Park up to the ‘carrying capacity’ of these adjacent lands. The Park Service should acquire additional winter range adjacent to the Park by purchase, conservation easements, and modified grazing allotments. As an alternative to killing bison, excess numbers should be removed to Indian Reservations and other public land. Bison are wildlife, not livestock! As such they should be managed by wildlife professionals - not livestock officials. Support should be given for the National Wildlife Federation/InterTribal Bison Cooperatives Seven-Point Plan for managing the bison.” - Individual, Charlottesville, VA, YELL-1115.

Comment 4

“Specifically I urge that steps be taken to allow bison to follow their normal migration paths during hard winters. This includes compensation for private owners whose property is damaged by buffalo.” - Individual, Berkeley, CA, YELL-5161.

VEGETATION/VEGETATIVE COMMUNITIES

111 comments. The primary issue raised by commentors concerning vegetation was overgrazing of the rangelands, both inside and outside the Park, and degradation to various vegetative communities. Comments indicated there were presently too many bison in the Park to be supported by the existing range vegetation. Others suggested that Forest Service grazing allotments were also being overgrazed. Overgrazing of the Park by bison and elk was a complaint of 25 comments while overgrazing of public lands outside the Park was mentioned by eight comments. Five comments focused on the degradation of riparian areas and two comments focused on the loss of aspens and willows in areas in the Park due to intensive grazing pressures and resultant erosion. These same comments indicated that water quality and fisheries were also being affected by erosion. The invasion of noxious weeds into areas that are overgrazed was identified by two comments. The absence of analysis of threatened or endangered plants and potential effects from bison grazing was mentioned in several comments. The need for a scientifically developed carrying capacity for bison in the Park was requested in several comments. Related comments can be found in BISON - Population and Population with an Upper and Lower Level.

Comment 1

“I am concerned that you’ve not addressed any rare plant species, as you have some animal species. Perhaps the full document at least lists what species occur within the area of impact. If

not, surely your documentation is inadequate. Have you addressed rare plant issues? What species could be effected by your decisions? Do you even know what species exist in the project area?" Individual, Ball, LA, YELL-7481.

Comment 2

"From a cultural aspect the bison are very important to all Native Americans. The buffalo are in every part of the Lakota circle of life. They represent religion, nutrition, culture, strength, education, spiritual guidance, family values, and harmony. The bison are also excellent cultivators of the land. Their hoof action disturbs the soil thus enabling a wide range of plant diversity to regenerate. When they wallow or roll in the many grasses covering the prairie the seeds of these plants become trapped in their coats and are carried to different parts of the ranges. This is a few of the reasons that the bison are so very important to our ecosystem. The state of Montana should be one of the first to recognize this since their ecosystem is pretty fragile. With the bison around Montana's overgrazed lands might be restored to a certain degree." - Organization - Oglala Lakota College/Bison Project Interns, YELL-15384.

Comment 3

"Quarantining the animals will not only heighten the chance of spreading disease within the herd but also damage grazing land..." - Individual, Napanoch, NY, YELL-1821.

Comment 4

"The carrying capacity of YAP must be established and the bison population must be controlled based on the availability of forage and other factors determining the carrying capacity of YAP." - Organization, Livestock Conservation Institute, YELL-9686.

Comment 5

"Maybe the real reason they want the bison killed is because they fear that bison will take forage away from their cattle." - Individual, Tulsa, OK, YELL-4093.

Comment 6

"The purchase of CUT lands [winter range lands] serves two purposes. Buffalo and other wild animals such as elk, will migrate there in winter and save the Park overload..." "...doesn't it make sense to maintain a bison population that the Park can provide for (and no more) and to provide a food supply during the winter months (if deemed necessary)." - Individual, Dayton, OH, YELL-7502.

Comment 7

“Additionally, we contend that the DEIS is insufficient because it does not contain an alternative-by-alternative analysis of the impacts of the various bison population objectives on significant elements of the affected environment. It does not address the impact of the proposed bison population projections on range conditions, riparian conditions and water quality, or the invasion of noxious weeds into the park. No analysis is presented on the impacts of the various alternatives on the endangered, threatened, or sensitive species that are, and will continue to be impacted by bison management decisions, particularly Westslope and Yellowstone cutthroat trout.” - Public Agency, State of Idaho Governor, YELL-11121.

HUNTING

4,456 comments. Comments were approximately 67 percent supportive and 33 percent opposed. The large number of supportive responses was influenced by the large number of form letters sent in response to the Citizen’s Plan alternative. The Citizen’s Plan includes limited hunting as a last resort (part of the "fair chase harvest" referred to in the Plan) to control bison population numbers. Comments from those opposed stated it is impossible to conduct a fair chase hunt of bison because they have no fear of people. Comments from supporters of hunting stated a fair, open public hunt was an acceptable method of controlling the population. Most comments opposed to hunting combined it with their opposition to capture and slaughter, agency shooting, and public hunting. Some comments suggested returning to “primitive hunts” using no modern weapons and no vehicles, and other comments suggested allowing Native Americans to hunt inside the Park. Related comments can be found under Capture/Test/Slaughter Operations, Agency Shooting.

Comment 1

“Hunting Yellowstone bison is like hunting parked cars. It is unethical, unsporting and unnecessary.” - Individual, Austin, TX, YELL-1019.

Comment 2

“Classify bison as a big game animal and crop excess animals outside the park thru controlled hunting.” - Individual, Marton, TN, YELL-1022.

Comment 3

“Control of the bison population could be done with selective hunting on USFS lands with biologically sound parameters, rather than the indiscriminate mass slaughter which took place.” - Individual, Corvallis, OR, YELL-5663.

Comment 4

“Hunting is not disease control, it is population control, and that is not the directive given to those who drafted the EIS. Even if it were, there is no scientific proof given within the pages of this document to show why the population of Yellowstone’s bison need to be limited.” - Individual, Columbus, MT, YELL-13206.

Comment 5

“As a hunter, I find the slaughter of bison in winter repugnant and contrary to all standards of ethical hunting.” - Individual, Boulder, CO, YELL-2556.

Comment 6

“Allow bison to reach population levels dictated by environmental conditions, controlling extreme overpopulation with a limited hunt and/or removal of a portion of the herd to other public lands/National Parks or to the InterTribal Bison Cooperative.” - Individual, Edgewater, FL, YELL-7554.

Comment 7

“I believe in the 1868 Fort Laramie Treaty there is a stipulation that as long as there are buffalo in sufficient numbers to justify a hunt that the Tribes do have a right to hunt these animals. I would certainly make a strong case that because the state and federal governments have been participating in killing a thousand of these buffalo in the last 2 years that provision probably comes into play in this.” - Organization - ITBC, YELL-17714.

PROPERTY DAMAGE

617 Comments. The major issue was property damage to livestock operators in the area who experience losses to fences, range improvements, and even structures. The majority of comments were in favor of relocating bison from private lands only in the case of protecting the land and for human safety. These comments also maintained that only non-lethal, non-restrictive methods be used. A few comments suggested fencing as an option to keeping bison off private lands. Compensation to land owners that have property damage was mentioned in numerous comments, to be funded by either the federal government or a special fund. A very few suggested removal or shooting of bison on private lands.

Comment 1

“If bison threaten private land or human safety, it is reasonable to adopt non-lethal, non-restrictive methods of removal.” - Individual, Los Angeles, CA, YELL-13148.

Comment 2

“When private property is in question, put up a bison enclosure/fence to keep bison and cattle separate.” - Individual, Hot Springs, SD, YELL-11134.

Comment 3

“Damage by bison to private land should be compensated for to the private landowner by the U.S. Government.” - Individual, Sheridan, WY, YELL-11159.

Comment 4

“...(support) removal/shooting of any bison on private land outside of the park.” - Individual, Homestead, FL, YELL-13164.

Comment 5

“What is the source of information that describes how and with what frequency bison harm livestock and damage structures? Are there documented instances of this harm and damage?” - Individual, Brandon, FL, YELL-13421.

RANCHING

47 comments. The major issue was that the proposed management plan tended to treat bison like livestock rather than wildlife. There are three major sub-issues in the comments under this topic: (1) Several comments wanted to avoid treating the bison like livestock by avoiding the use of any "ranching methods" to manage the bison, such as roundups with vehicles, cutting hay along Slough Creek, reopening the Lamar Buffalo Ranch, holding bison in corrals, or other management activities within the Park. (2) Several comments indicated that selling bison to bison ranches or giving/selling them to build herds in other states on wildlife preserves was a preferable alternative to killing them. Any funds derived from bison sales could be used in various ways to promote the Yellowstone bison herd, including assistance to ranchers to vaccinate their cattle, acquiring new bison to increase genetic diversity, funding a monitoring plan, or buying supplemental winter feed. (3) Several comments felt that area ranches or adjacent grazing lands should be converted to wildlife (bison) use instead of cattle.

Comment 1

“I would definitely prefer not to see a situation where the Lamar Buffalo Ranch is reopened (or a similar operation), or where Slough Creek is once again cut for hay to keep elk and bison from migrating, or any other return to proactive management deep within Park boundaries.” - Individual, Jackson, WY, YELL-13213.

Comment 2

“In my state of North Dakota, buffalo are being raised and valued by ranchers as well as the native people and they are honored in Jamestown where a special herd has been raised and the area is a tourist attraction. All life is sacred. Buffalo are sacred and it is terribly wrong to allow them to be slaughtered needlessly. - Individual, Fargo, ND, YELL-8382.

Comment 3

“Farming wild animals will be the death of hunting in this country, as that will spell the end of wild things to hunt. Chronic Wasting Disease is spreading because APHIS is allowing elk, deer, and bison to be commercially farmed; unnaturally crowded together and stressed. Other diseases will take their toll on the farmed-for-profit wildlife, but they will eventually take their toll on humans as well. I don’t think it can come too soon. Is the hunting community going to stand by and allow our native wildlife to be domesticated, contained and managed for more canned hunt experiences? I think not. In order to preserve the wildlife, it has to be free and act wild.” - Individual, Tucson, AZ, YELL-3184.

Comment 4

“The bison value issue. Outside the park and SMAs the cattle industry should encourage herders to replace cattle with bison instead of shooting bison. Profits in the cattle market are marginal. Profits in the niche markets like bison meat are not, given the right investments. Initiative could come from state or federal agencies. Advantages: income and new local business and prospect for the ranching industry, social hope through homage to American cultural history...” - Individual, Emmittbaden, Switzerland, YELL-7095.